

# EXHIBIT 2



## James Allen

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**From:** Howard Hertz <hhertz@hertzschram.com>  
**Sent:** Monday, December 23, 2024 4:23 PM  
**To:** James Allen  
**Cc:** Peter Doyle  
**Subject:** RE: Estate of B. Worrell v. Clinton and Thang

Dear Mr. Allen:

In response to your email to me dated December 20, 2024, I leave it to Mr. Quick to respond to your allegations regarding what you have characterized as a “belated” production of the Settlement Agreement between Westbound and the Worrell Estate.

As to your allegations that I made misrepresentations of fact to prevent written discovery and/or depositions from going forward that is patently false. Furthermore, based on the Magistrate’s orders on the record, my clients produced those documents required that are in their possession and Mr. Boladian appeared for his deposition in a timely manner. Incredibly, you have not even advised me as to what your alleged abuse involves, so how could I agree to any of your proposed remedies?

Any attempt to recover costs and fees or sanctions as to my or my clients’ actions in these regards will be responded to with requests for sanctions, costs and attorney fees against you for abusive motion practice. To summarize, I don’t agree with any of your proposed relief.

HH

### Howard Hertz, Esq.

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**From:** James Allen <james.allen@sbddetroit.com>  
**Sent:** Friday, December 20, 2024 1:35 PM  
**To:** Howard Hertz <hhertz@hertzschram.com>  
**Cc:** Peter Doyle <Peter.Doyle@sbddetroit.com>  
**Subject:** Estate of B. Worrell v. Clinton and Thang

\*\*EXTERNAL SENDER\*\*

Dear Mr. Hertz:

On behalf of the Clinton defendants in the above captioned litigation, I have contacted Mr. Quick as Plaintiff's counsel seeking to confer regarding relief I intend to seek for discovery/motion practice sanctions related to the belated production of the Settlement Agreement between Westbound and the Worrell Estate in 2023. That document was only produced to us in late November of this year, despite its relevance and having been the subject of several prior requests. It prejudiced my client's ability to complete discovery.

In the course of preparing my motion, I have had occasion to review the correspondence, pleadings and hearing transcript in which both the Estate and your client resisted third party discovery from Westbound and other related, Boladian parties. I believe that you also made misrepresentations of fact as to whether the parties you represented maintained relevant information and documents in an effort to prevent the written discovery and/or depositions from going forward. I further believe that this was done in concert with the plaintiffs, both in the written submissions and orally to the Court at the Motion hearing in November.

Accordingly, it is my intention to seek sanctions for motion practice and or discovery abuse. In particular, I intend now to seek, *inter alia*, to reopen discovery as to all the parties and third parties, to recover costs and fees for motion practice and discovery taken to date, and to preclude Westbound from intervening to assert its ownership rights under the Settlement Agreement with the Worrell Estate as the real party in interest.

I am required by local rule to give you advance notice of my intentions in this regard and see to what extent, if any, you wish to agree to any or all of this relief. Please let me know as soon as possible.

Very truly yours,  
James Allen

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